

REMARKS

Applicant respectfully thanks the Examiner for the consideration provided to this application, and respectfully requests reconsideration of this application.

Each of claims 15-18 has been amended for at least one reason unrelated to patentability, including at least one of: to explicitly present one or more elements, limitations, phrases, terms and/or words implicit in the claim as originally written when viewed in light of the specification, thereby not narrowing the scope of the claim; to detect infringement more easily; to enlarge the scope of infringement; to cover different kinds of infringement (direct, indirect, contributory, induced, and/or importation, etc.); to expedite the issuance of a claim of particular current licensing interest; to target the claim to a party currently interested in licensing certain embodiments; to enlarge the royalty base of the claim; to cover a particular product or person in the marketplace; and/or to target the claim to a particular industry.

Descriptive support for the amendments to claim 15 can be found in at least paragraphs 12, 14, 20, 22, 24, 28, 47, 48 53, 64, and 77 as well as FIGS. 1 and 2. Descriptive support for the amendments to each of claims 16 and 17 can be found in at least paragraph 22. Descriptive support for the amendment to claim 18 can be found in at least paragraphs 28 and 77.

Claims 15-32 are now pending in this application. Claim 15 is in independent form.

I. The Objection to Claim 18

Via the present Office Action, claim 18 was objected to for allegedly being identical to claim 25. Without acquiescing to the present Office Action's position, this objection is respectfully traversed as moot in light of the current amendment to claim 18. Therefore, it is respectfully submitted that any grounds for these objections has been removed, and respectfully request acknowledgment thereof.

II. The Anticipation Rejections

Via the present Office Action, each of claims 15 and 19-24 was rejected as anticipated, and thus unpatentable, under 35 U.S.C. 102(b). In support of the rejection, various portions of U.S. Patent Application 2001/0049720 ("Eyer") were applied.

Without acquiescing to the present Office Action's position, each of these rejections is respectfully traversed in its entirety as moot in light of the current amendment to the corresponding claim. Specifically, claim 15, from which each of claims 19-24 ultimately depends, states, *inter alia*, yet no substantial evidence has been presented that the applied portions of Eysers teach, "a telephone connector adapted to allow connection of a PSTN telephone terminal to said IP enabled terminal, said PSTN telephone terminal adapted to provide voice transmission for said video telephony application". Furthermore, no substantial evidence has been presented that the applied portions of Eysers teach "a digital signal processor adapted to provide encoding and decoding functionality to the video telephony application and decoding functionality to the digital video broadcast application". Consequently, reconsideration and withdrawal of these rejections is respectfully requested.

III. The Obviousness Rejections

Via the present Office Action, each of claims 16-18 and 25-32 was rejected under 35 U.S.C. 103(a) as being obvious, and thus unpatentable, over various combinations of U.S. Patent Application 2001/0049720 ("Eyer") and/or U.S. Patent 5,999,207 ("Rodriguez").

Without acquiescing to the present Office Action's position, each of these rejections is respectfully traversed in its entirety as moot in light of the current amendment to the corresponding claim. As explained above, claim 15, from which each of claims 16-18 and 25-32 ultimately depends, states, *inter alia*, yet no substantial evidence has been presented that the applied portions of Eysers teach, "a telephone connector adapted to allow connection of a PSTN telephone terminal to said IP enabled terminal, said PSTN telephone terminal adapted to provide voice transmission for said video telephony application" or "a digital signal processor adapted to provide encoding and decoding functionality to the video telephony application and decoding functionality to the digital video broadcast application". Rodriguez fails to overcome any of these deficiencies in Eysers.

Thus, even if there were proper evidence of obviousness presented in the present Office Action (an assumption that is respectfully traversed), and even if there were a reasonable expectation of success in combining or modifying the applied portions of the references relied upon in the present Office Action (another assumption that is respectfully traversed), no

substantial evidence has been presented the applied portions of the references relied upon in the present Office Action, **as attempted to be modified and/or combined**, expressly or inherently teach **every** limitation of the independent claims, and consequently the present Office Action fails to establish a *prima facie* case of obviousness. Consequently, for at least the reasons mentioned above, reconsideration and withdrawal of these rejections is respectfully requested.

CONCLUSION

It is respectfully submitted that the application is in clear condition for allowance. Reconsideration of the application, withdrawal of all grounds of objection and rejection, and issuance of a Notice of Allowance are earnestly solicited.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. 1.16 or 1.17 to Deposit Account 50-2504. The Examiner is invited to contact the undersigned at 434-972-9988 to discuss any matter regarding this application.

Respectfully submitted,

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